

**THE DEBTORS' ONE HUNDRED SEVENTY-SIXTH OMNIBUS
OBJECTION TO CLAIMS SEEKS TO RECLASSIFY AS EQUITY
CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS
NOTICE SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF
THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS
OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO
DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR
CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
DEBTORS' COUNSEL, ERIKA DEL NIDO, AT 212-310-8323.**

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Robert J. Lemons

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**NOTICE OF HEARING ON DEBTORS'
ONE HUNDRED SEVENTY-SIXTH OMNIBUS OBJECTION TO
CLAIMS (TO RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS)**

PLEASE TAKE NOTICE that on August 19, 2011, Lehman Brothers Holdings
Inc. ("LBHI") and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and
debtors in possession (collectively, the "Debtors"), filed their one hundred seventy-sixth

omnibus objection to claims (the “One Hundred Seventy-Sixth Omnibus Objection to Claims”), and that a hearing (the “Hearing”) to consider the One Hundred Seventy-Sixth Omnibus Objection to Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **October 5, 2011 at 10:00 AM (prevailing Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the One Hundred Seventy-Sixth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court’s filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq. and Mark Bernstein, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq. and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O’Donnell, Esq. and

Evan Fleck, Esq.); so as to be so filed and received by no later than **September 20, 2011 at 4:00 PM (prevailing Eastern Time)** (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the One Hundred Seventy-Sixth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the One Hundred Seventy-Sixth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: August 19, 2011
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., et al.,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
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**DEBTORS' ONE HUNDRED SEVENTY-SIXTH OMNIBUS
OBJECTION TO CLAIMS
(TO RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS)**

**THIS OBJECTION SEEKS TO RECLASSIFY
AS EQUITY CERTAIN FILED PROOFS OF CLAIM.
PARTIES RECEIVING THIS ONE HUNDRED SEVENTY-SIXTH
OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW
THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S)
AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION
AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE
WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).**

**IF YOU HAVE QUESTIONS, PLEASE CONTACT
DEBTORS' COUNSEL, ERIKA DEL NIDO, AT 212-310-8323.**

TO THE HONORABLE JAMES M. PECK
UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. (“LBHI”) and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”), respectfully represent as follows:

Relief Requested

1. The commencement of the Debtors’ chapter 11 cases has impacted parties in interest around the globe, including the Debtors’ prepetition counterparties, customers, and investors. Prepetition employees of the Debtors and their affiliates have, most certainly, also been affected. The Debtors attempted to minimize the impact on employees by, among other things, preserving more than 10,000 jobs through various asset sales and by transferring funds to establish a health care trust to backstop certain medical benefits. Unfortunately, as a result of the dramatic collapse of the Lehman enterprise, employees, like investors, could not be made whole for all of their damages and the nature of some of their compensation – in the form of restricted stock units or contingent stock awards – requires that their recovery be subordinated to claims against the Debtors. The law permits no other outcome.

2. The proofs of claim listed on Exhibit A annexed hereto (collectively, the “Compensation Claims”) were filed by current and/or former employees of the Debtors and/or their affiliates on the basis of either restricted stock units, contingent stock awards, stock options, or other equity-related compensation (together, the “Equity Awards”). The Equity Awards were compensation awards which, among other things, provided the employee with the right to shares of LBHI common stock on a future date upon the satisfaction of certain conditions. Certain of the Equity Awards were distributed or vested, while others were not distributed or unvested.

3. The ownership of the Equity Awards constitutes an equity interest in a Debtor, but does not constitute a claim against a Debtor's estate as such term is defined in section 101 of title 11 of the United States Code (the "Bankruptcy Code"). Accordingly, the Debtors file this omnibus objection, in accordance with Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and this Court's order approving procedures for the filing of omnibus objections to proofs of claim (the "Procedures Order") [Docket No. 6664] to reclassify the Compensation Claims as equity interests.

Jurisdiction

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

Background

5. Commencing on September 15, 2008 and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

6. On September 17, 2008, the United States Trustee for Region 2 (the "U.S. Trustee") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "Creditors' Committee").

7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the "Examiner"), and, by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's appointment of the

Examiner. The Examiner filed its report with the Court on March 11, 2010 pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].

8. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to up to 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.

The Equity Awards Are Not Claims

9. The Debtors continue their review of the claims filed on the claims register in these cases and maintained by the Court-appointed claims agent. As indicated on Exhibit A, certain of the Compensation Claims were improperly filed as secured or general unsecured claims and others were improperly filed as claims having priority pursuant to section 507(a) of the Bankruptcy Code. Each of the Compensation Claims must be reclassified as an equity interest.

10. Both the Bankruptcy Rules and the Procedures Order provide grounds to object to the Compensation Claims. Bankruptcy Rule 3007(d)(7) provides that a debtor may file an objection, and join one or more objections in an omnibus objection, if all of the claims “are based solely on the grounds that the claims should be disallowed, in whole or in part, because ... they are interests, rather than claims.” FED. R. BANKR. P. 3007(d). The Procedures Order additionally permits the Debtors to object, on an omnibus basis, to claims that “were incorrectly classified.” Procedures Order at 2.

11. Once objected to, a filed proof of claim is no longer “deemed allowed.” 11 U.S.C. § 502(a) (“A claim or interest, proof of which is filed ... is deemed allowed, unless a party in interest ... objects.”). If an objection refuting at least one of the claim’s essential

allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc'ns Corp.*, No. 02-41729, 2007 Bankr. LEXIS 660 at *15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).

The Compensation Claims Should Be Reclassified as Interests

A. The Compensation Claims Are for Equity Securities.

12. Section 501(a) of the Bankruptcy Code provides that a creditor may file a proof of claim and that an equity security holder may file a proof of interest. 11 U.S.C. §501(a). The Bankruptcy Code defines a “claim” as a right to payment. *Id.* at §101(5). The Bankruptcy Code definition of an “equity security,” alternatively, includes a share in a corporation or similar “security,” including “stock,” “treasury stock,” “other claim or interest commonly known as ‘security,’” “certificate of interest or participation in,” and “warrant or right to subscribe to or purchase or sell, a security.” *Id.* at §§ 101(16) and 101(49)(A).

13. Courts have interpreted the definition of equity security to include a range of stock-based transactions, including transactions based on a right to acquire stock, such as stock options and stock assignments. *E.g., In re Enron Corp.*, 341 B.R. 141, 162 (Bankr. S.D.N.Y. 2006) (holding that a phantom stock purchase program where delivery of shares was deferred for tax purposes qualified as a “security” under the Bankruptcy Code); *see also In re Baldwin-United Corp.*, 52 B.R. 549, 552 (Bankr. S.D. Ohio 1985) (holding that claims to exercise stock option portion of plan were equity security interests for purposes of determining priority).

14. The Equity Awards provided grantees with a right to acquire common stock in LBHI upon satisfaction of certain conditions precedent, similar to stock options or the

right to exercise stock options. As a result, the Equity Awards fall within the definition of “equity securities” under the Bankruptcy Code. Because each of the Compensation Claims is based on the ownership of the Equity Awards, the Debtors hereby object to reclassify the Compensation Claims as equity interests.

**B. Subordination Provisions Present in Certain of the Agreements
Are Enforceable Pursuant to Bankruptcy Code Section 510(a).**

15. Notwithstanding that the Compensation Claims must be reclassified as equity securities, Agreements governing certain of the Equity Awards (the “Agreements”) provide that, in the event of a bankruptcy of LBHI, all claims arising from, in connection with, or in any way relating to, any failure of LBHI to deliver shares of common stock shall have the same priority as, and no greater priority than, common stock interests in LBHI. These Agreements advised grantees that:

All of [their] claims arising from, in connection with, or in any way relating to, any failure of [LBHI] to deliver to [them], or to a subsidiary for delivery by such subsidiary to [them], shares of Common Stock on the date when such shares are due to be delivered under this Agreement in satisfaction of each Unit granted to you shall be deemed, in the event of a bankruptcy of [LBHI], to be claims for damages arising from the purchase or sale of Common Stock of [LBHI], within the meaning of section 510(b) of the Bankruptcy Code and shall have in such bankruptcy the same priority as, and no greater priority than, common stock interests in [LBHI].

See, e.g., 2003 and 2004 Equity Award Program Agreement, ¶ 10.

16. Section 510(a) of the Bankruptcy Code provides that “[a] subordination agreement is enforceable ... to the same extent that such agreement is enforceable under applicable nonbankruptcy law.” 11 U.S.C. § 510(a). Courts have routinely held that the “enforcement of lawful subordination agreements by Bankruptcy Courts does not offend the policy of equal distribution of the bankrupt’s estate.” *In re Leasing Consultants, Inc.* 2 B.R. 165,

168 (Bankr. N.Y. 1980), *citing In re Credit Industrial Corp.*, 366 F.2d 402, 407 (2d Cir. 1966).

Under general contract law principles, when a subordination agreement is unambiguous, the parties' rights are governed exclusively by that agreement. *In re Leasing Consultants, Inc.*, 2 B.R. at 169.

17. Compensation Claims arising out of agreements with subordination provisions similar to the one referred to above should have the same priority as common equity interests in LBHI, and the Court should reclassify such claims as interests.¹ Holders of such Compensation Claims do not have claims against the Debtors.

C. Bankruptcy Code Section 510(b) Mandates that the Compensation Claims Have the Same Priority as Common Equity of LBHI.

18. Another reason the Compensation Claims must be treated as equity is that section 510(b) of the Bankruptcy Code provides that for purposes of distribution, a claim for damages arising from the purchase or sale of a security shall have the same priority as the security. 11 U.S.C. § 510(b).

19. As noted above, the Equity Awards fall within the Bankruptcy Code definition of "security." In addition, the grant of the Equity Awards constitutes a "purchase or sale" of a security. "Courts interpreting section 510(b) have read the term 'purchase' broadly and have included within its scope grants of stock and stock options as compensation." *In re Wireless Corporation, Inc.* 384 B.R. 713, 718 (Bankr. D. Del. 2008). In *Wireless Corporation*, for example, the Delaware Bankruptcy Court held that the debtor's grant of an equity compensation package, consisting of shares of stock and warrants, constituted a "purchase or

¹ The Bankruptcy Code, Bankruptcy Rules and case law make clear that the Debtors do not need to commence an adversary proceeding either to enforce a subordination agreement pursuant to Bankruptcy Code section 510(a) or to seek to subordinate a Compensation Claim pursuant to Bankruptcy Code section 510(b). FED. R. BANKR. P 7001(8); *In re Lernout & Hauspie Speech Prods., N.V.*, 264 B.R. 336, 339 (Bankr. D. Del. 2001) ("Because Rule 7001(8) appears to limit subordination complaints to allowed claims, the appropriate procedural vehicle for resolution of the issue is a contested matter under Fed. R. Bankr. P. 9104.").

sale” of a security. *See also In re Med Diversified Inc.*, 461 F.3d 251, 256 (2d Cir. 2006) (holding that claim based on debtor’s failure to issue its common stock to employee in exchange for his stock in another company, allegedly in violation of the parties’ termination agreement, was a claim arising from the purchase or sale of the debtor’s stock.); *In re Touch Am. Holding, Inc.*, 381 B.R. 95, 104 (Bankr. D. Del. 2008) (holding that claims based on stock received as matching contribution under an ERISA plan likewise constituted a “purchase or sale” of securities).

20. In *Enron*, employees filed claims asserting a right to payment for damages in connection with unexercised stock options they had received during the course of their employment. The Court held that it was clear that a stock option was a “security” as that term was defined in section 510(b) of the Bankruptcy Code. *Enron*, 341 B.R. at 150. The Court further found that, “[w]hile it is true that the Claimants did not purchase the stock options on the open market, they nonetheless exchanged value for the options: here, their labor. Such exchange falls under a broad reading of the term ‘purchase.’” *Id.* at 151 (citing *Frankum v. Int’l Wireless Communications Holdings, Inc. (In re Int’l Wireless Communications Holdings, Inc.)*, 279 B.R. 463 (D. Del. 2002) (“That Appellants received the Debtors’ stock as part of a compensation package does not preclude the transfer from being characterized as a purchase/sale of the Debtors’ stock.”)). This was true even where the employees “never elected to receive stock options, but rather were required to take a minimum percentage of their annual bonus in stock option form.” *Id.* The Court found flaws in the employees’ argument that they did not “purchase” the stock options, because there was no voluntary exchange of goods, services or currency:

Although implicit, there is nonetheless a bargain and exchange of value. Here, the exchange is made not at the time of payment but

prior to employment. If these Claimants were required to receive a portion of their compensation as options, that was a condition of employment the Claimants willingly accepted in return for their labor. These Claimants, thus, "purchased" the stock options with their labor.

Id.

21. The Court in *Enron* further concluded that “claims alleging the fraudulently induced election of stock options as part of a compensation package are claims ‘arising from’ the purchase of a security and should thus be subordinated pursuant to section 510(b).” *Id.* “[P]hysical possession of the security is not required for a claim based upon that security to be subordinated.” *Id.* at 163 (citing *American Broad. Sys. v. Nugent (In re Betacom of Phoenix, Inc.)*, 240 F.3d 823 at 829-30 (9th Cir. 2001) (finding that “[n]othing in § 510(b)'s text requires a subordinated claimant to be a shareholder.”)).

22. Like it did in *Enron*, the Court should find that the Equity Awards in this case are equity interests and the Compensation Claims arise from the purchase and sale of securities. As the Court found in *Enron*, neither the fact that Equity Awards were a form of compensation for services performed, nor the fact that claimants asserting Compensation Claims could not opt to receive compensation in cash in lieu of Equity Awards converts the Compensation Claims into claims for debt. Any portion of a Compensation Claim alleging the claimant was induced to accept or retain its Equity Awards should similarly be subordinated pursuant to section 510(b) of the Bankruptcy Code.

Reservation of Rights

23. The Debtors reserve all their rights to object on any basis to any Compensation Claim or any portion of any Compensation Claim for which the Court does not grant the relief requested herein.

Notice

24. No trustee has been appointed in these chapter 11 cases. Notice of this One Hundred Seventy-Sixth Omnibus Objection to Claims has been provided to: (i) each claimant listed on Exhibit A; (ii) the U.S. Trustee for Region 2; (iii) the attorneys for the Creditors' Committee; (iv) the Securities and Exchange Commission; (v) the Internal Revenue Service; and (vi) the United States Attorney for the Southern District of New York, in accordance with the Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures, dated February 13, 2009 [Docket No. 2837] and the Procedures Order. The Debtors submit that such notice is sufficient and no other or further notice need be provided.

25. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: August 19, 2011
New York, New York

/s/ Robert J. Lemons
Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
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Attorneys for Debtors
and Debtors in Possession

EXHIBIT A

IN RE: LEHMAN BROTHERS HOLDINGS INC., CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
1	ANDREE, KEVIN 10 ARROWWOOD DRIVE HAMILTON, NJ 08690	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	21373	\$33,836.00
2	ANDREWS, COLLETTE 710 VALLEY STREET MAPLEWOOD, NJ 07040	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	36944	\$14,261.00
3	ASHE, KATHLEEN M 219 TRENTON BLVD SEA GIRT, NJ 08750		Lehman No Case Asserted/All Cases Asserted	09/14/2009	12143	\$11,500.00
4	BAER, NORBERT 194 ASCAN AVENUE FOREST HILLS, NY 11375		Lehman No Case Asserted/All Cases Asserted	09/22/2009	28086	Undetermined
5	BAXTER, SUSAN EVELYN 8 EXETER MEWS LONDON, SW61PW UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	02/25/2009	3016	\$28,007.27
6	BRAND, JAMES G. 375 BLYTHE ROAD RIVERSIDE, IL 60546	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/15/2009	13045	\$11,119.00
7	BRANDT, GARY G. 12353 SOUTHHAMPTON DRIVE BISHOPVILLE, MD 21813	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17843	\$1,713,462.00
8	BRAY, ANTHONY 13 CO-OPERATIVE ST SPRINGHEAD LANCS OLDHAM, OL45TH UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/21/2009	24453	\$851,000.00
9	BRENNAN, TERRY PEAR TREE LODGE, BLACKNESS LANE WOKING SURREY, GU22 7SB UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/14/2009	12235	\$84,000.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
10	BROWN, MELVILLE M. JR. 9516 FAIRCREST DRIVE DALLAS, TX 75238	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/31/2009	9856	\$15,504.92
11	BUTTON, JEAN C. FLAT 1, 22 HERMON HILL WANSTEAD LONDON, E11 2AP UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/11/2009	11516	\$21,296.00
12	CALHOUN, JOHN W. III 532 PEACHTREE BATTLE AVE, NW ATLANTA, GA 30305	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19255	\$200,000.00
13	CALLIES, GUILLEMETTE 16 BIS, RUE SOYER NEUILLY-SUR-SEINE, F92200 FRANCE		Lehman No Case Asserted/All Cases Asserted	07/20/2009	5733	\$12,482.00
14	CALUS, DENISE 9 CLYDE CRESCENT UPMINSTER ESSEX, RM14 1SS UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/15/2009	12974	\$13,096.34
15	CANTELUPE, JAMES 1822 NORTH FREMONT CHICAGO, IL 60614	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	13294	\$370,896.09
16	CARAFI, PEDRO AV. URUGUAY 3241 UF 35 SAN FERNANDO (1644) BUENOS AIRES, ARGENTINA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24299	\$145,122.97
17	CARLOS, BONZON 260 WEST 54TH ST. APT 45E NEW YORK, NY 10019	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/03/2009	7289	\$152,059.06

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
18	CARLSON, RAYMOND M. 59 LONGVIEW ROAD PORT WASHINGTON, NY 11050		Lehman No Case Asserted/All Cases Asserted	08/10/2009	7800	\$66,309.32
19	CARTIER, ANNE MICHELE 16-16 160TH STREET WHITESTONE, NY 11357		Lehman No Case Asserted/All Cases Asserted	09/21/2009	20278	\$6,721.00
20	CASRIEL, LYLE 2 FIFTH AVENUE, APT. 5G NEW YORK, NY 10011	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/30/2009	2212	\$8,995.56
21	CHASE, LANDRETH PO BOX 426 LOCUST VALLEY, NY 11560	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/11/2009	8013	\$3,780,043.00
22	CHIPMAN, SANDS 5635 SOUTHWESTERN DALLAS, TX 75209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30743	\$66,777.64
23	CHRISTOPHER, STEVENS 17310 HALEY FALLS LANE HOUSTON, TX 77095	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/03/2009	7230	\$80,000.00
24	COHEN, DARIAN J. 5035 WAGNER WAY OAK PARK, CA 91377	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	16153	\$428,550.00
25	COHEN, MICHAEL C 9 MEADOWS WOODS ROAD LAKE SUCCESS, NY 11020	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30001	\$100,945.71
26	COHEN, PABLO ORTIZ DE OCAMPO 2655 PISO 7 DTO 1 BUENOS AIRES, 1425 ARGENTINA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25424	\$6,179.58
27	CONNOLLY, THOMAS J. 3545 BRIDLE CREEK DRIVE SUWANEE, GA 30024	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/06/2009	5129	\$128,761.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
28	CONNOLLY, THOMAS J. 3545 BRIDLE CREEK DRIVE SUWANEE, GA 30024	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/06/2009	5130	\$7,694.00
29	COQUIS POWER, LAURA FORMERLY LAURA STILLMAN FLAT 6, 1A GROSVENOR GARDENS LONDON, SW1 0BD UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	08/10/2009	7843	\$115,845.41
30	D'ALOIA, LOUIS 268 FERNHEAD AVE MONROE TOWNSHIP, NJ 08831	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/03/2009	10193	\$15,080.12
31	DA SILVA, ANTONIO R. 3 TAMARA CT CENTEREACH, NY 11720	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17311	\$23,002.00
32	DELMONTE, GREGORY 5 SADDLE BROOK DR HO HO KUS, NJ 07423-1315	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25494	\$288,903.67
33	DONOFRIO, JAMES 21 PENBROOK LOOP STATEN ISLAND, NY 10309		Lehman No Case Asserted/All Cases Asserted	09/17/2009	15585	\$1,232.00
34	DUDA, MICHAEL 380 92ND ST. APT. D9 BROOKLYN, NY 11209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31872	\$1,091.38
35	FORTUNE, JANICE K 4500 PARK COURT BELLAIRE, TX 77401	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15557	\$100,000.00
36	FOSTER, BENJAMIN 814 TULIP LN NAPERVILLE, IL 60540-7333	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	19196	\$20,744.46

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
37	FU, TIANNA 25 COUNTY CENTER ROAD APT A-12 WHITE PLAINS, NY 10607	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28742	\$19,568.00
38	GASPARRO, PAUL 105 STUYVESANT AVE RYE, NY 10580	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/30/2009	2335	\$900,568.01
39	GILFENBAUM, AMY S 2 HORATIO ST. APT.5L NEW YORK, NY 10014		Lehman No Case Asserted/All Cases Asserted	09/16/2009	13970	\$51,750.31
40	GLADSTONE, ABBEY H. 9130 BAYBURY LN WEST PALM BCH, FL 33411-1890	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/15/2009	12660	\$482,241.44
41	GOODWYN, RICHARD B. JR. 8 NORTH ROHALLION DRIVE RUMSON, NJ 07760	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/24/2009	9112	\$6,483.21
42	GRAVES, JOSEPH T. 28940 N SKYCREST DR. MUNDELEIN, IL 60060		Lehman No Case Asserted/All Cases Asserted	09/21/2009	25560	\$355,495.00
43	GREENSPAN, NEIL 200 RIVERSIDE BLVD APT 4M NEW YORK, NY 10069	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	16225	\$18,677.33*
44	GREGORY, JOSEPH 26 LLOYD HAVEN DRIVE HUNTINGTON, NY 11743	08-13555 (JMP)	Lehman Brothers Holdings Inc.	05/29/2009	4645	\$232,999,548.71
45	GUERRON, JORGE 3 TUDOR PLACE MANALAPAN, NJ 07726	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	17310	\$8,836.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
46	HALLS, DEBORAH G. 32 KIMBERLEY ROAD WALTHAMSTOW, E17 5EE UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/20/2009	8820	\$741.00
47	HOLLAND, ROBERT L. 176 ROUND HILL RD GREENWICH, CT 06831	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/21/2009	8969	\$706,200.00
48	HORNE, CATHY 3510 GARDEN MIST CIR AUBURN, GA 30011-2375	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18309	Undetermined
49	HUIDOBRO, JORGE MARIANO DEL ARCA 249 SAN FERNANDO - 1646 BUENOS AIRES, ARGENTINA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	22268	\$12,866.18
50	JACOBSON, LARS P. 909 15TH ST. HERMOSA BEACH, CA 90254	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	24335	\$408,027.05
51	JOHNSON, BENJAMIN P. 820 WEST OAKDALE #1 CHICAGO, IL 60657	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	13292	\$7,762.50
52	JUNDANIAN, GREGORY 56 GLENRIDGE ROAD DEDHAM, MA 02026		Lehman No Case Asserted/All Cases Asserted	09/18/2009	16239	\$73,305.00
53	KARETSKY, MARC I. 435 EAST 57TH STREET 8A NEW YORK, NY 10022	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29888	\$310,747.00
54	KENNEDY, KATHRYN 3030 N. CLIFTON AVE. CHICAGO, IL 606		Lehman No Case Asserted/All Cases Asserted	09/14/2009	12151	\$39,535.13

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
55	KHER, YOGESH 10 HASKEL DRIVE PRINCETON JUNCTION, NJ 08550		Lehman No Case Asserted/All Cases Asserted	01/30/2009	2229	\$31,136.00
56	KIEN KOTCHER, LAURI 250 EAST 87TH ST, APT 16F NEW YORK, NY 10128	08-13555 (JMP)	Lehman Brothers Holdings Inc.	02/10/2009	2684	\$2,066.06
57	KOLLYDAS, PETER 28 COLERIDGE DR MARLBORO, NJ 07746	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/28/2009	6499	\$29,251.00
58	KOLLYDAS, PETER 28 COLERIDGE DR MARLBORO, NJ 07746	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/28/2009	6501	\$7,130.00
59	KONNO, KENJI 6-18-2-801 SHIMOUMA SETAGAYAKU TOKYO, JAPAN	08-13555 (JMP)	Lehman Brothers Holdings Inc.	06/01/2009	4680	\$311,961.99
60	LAMAR, MARIO 21 PRINCESS COURT STAMFORD, CT 06903	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/06/2009	7467	\$150,089.32
61	LAURIE, KEVIN 90 ARRANDALE ROAD ROCKVILLE CENTRE, NY 11570	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18191	\$542,738.14
62	LAURINO, JOHN 2360 LINDENMERE DRIVE MERRICK, NY 11566		Lehman No Case Asserted/All Cases Asserted	09/17/2009	15274	\$65,426.73
63	LEACH, EVERETT 125 QUEENS AVENUE ELMONT, NY 11003		Lehman No Case Asserted/All Cases Asserted	09/22/2009	31669	\$37,923.07

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
64	LEE, JOHN DONG HYUN 2-1002 SEOCHO SAMSUNG GARDEN SUITE SEOCHO-DONG 1326, SEOCHO-GU SEOUL, KOREA, REPUBLIC OF		Lehman No Case Asserted/All Cases Asserted	09/14/2009	12059	\$18,077.79
65	LEE, MICHAEL 47 AMAGANSETT DRIVE MORGANVILLE, NJ 07751	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/13/2009	8219	\$1,050.00
66	LEE, PETER C. 1512 ISABELLA ST WILMETTE, IL 60091	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14857	\$7,852.75
67	LEVENTANT, LILIYA 74 OTTAWA RD S MARLBORO, NJ 07746-1246		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27957	\$14,393.00
68	LEVY, DORIAN A 25 W 75TH STREET APT 3B NEW YORK, NY 10023		Lehman No Case Asserted/All Cases Asserted	09/22/2009	29469	\$67,251.37
69	LIOTTI, FABIO 74 YORK MANSIONS PRINCE OF WALES DRIVE LONDON, SW11 4BW UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15120	\$3,519,222.00
70	LUCAS, JEROME D. 87 WHITE HILL ROAD COLD SPRING HARBOR, NY 11724	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29546	\$101,791.52
71	LUGTU, JONATHAN 142 BREWSTER AVE PISCATAWAY, NJ 08854-2229	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	21371	\$6,752.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
72	MACDONALD, ROBERTO JUAN IBERA 164 1609 BOULOGNE PROVINCIA DE BUENOS AIRES, ARGENTINA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	25551	\$17,699.20
73	MAITIN, ROBERT 121 FOREST DR. SHORT HILLS, NJ 07078	08-13555 (JMP)	Lehman Brothers Holdings Inc.	06/04/2009	4766	\$171,096.97
74	MANCILLA, DAVID H 11 GUINEA HOLLOW ROAD LEBANON, NJ 08833		Lehman No Case Asserted/All Cases Asserted	09/22/2009	30390	\$211,326.95
75	MANNING, MARJORIE R. 511 E SADDLE RIVER RD. RIDGEWOOD, NJ 07450	08-13555 (JMP)	Lehman Brothers Holdings Inc.	02/13/2009	2831	\$536,095.22
76	MARCUS, LISA 131 DEVRIESE COURT TENAFLY, NJ 07670	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	16329	\$529,200.00
77	MCCLELLAN, RYAN 444 HERMOSA AVENUE, #101 HERMOSA BEACH, CA 90254	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18225	\$55,014.47
78	MCCOOEY, KEVIN C. 315 EAST 68TH STREET APT 8T NEW YORK, NY 10021	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/04/2009	10370	\$378,851.13
79	MCGREGOR, FRANK 10 LEE COURT PLAINSBORO, NJ 08536	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/02/2009	10116	\$45,938.00
80	MCLAUGHLIN, MARY D 84 BASEVI WAY GREENWICH REACH LONDON, SE8 3JS UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/21/2009	8907	\$16,049.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
81	MCAHON, JOANNE PATRICIA 7B, 22 EAST 36TH STREET NEW YORK, NY 10016	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	28277	\$189,412.08
82	MEEK, MARY 4043 FAIRWAY DRIVE WILMETTE, IL 60091		Lehman No Case Asserted/All Cases Asserted	09/22/2009	32396	\$5,700.00*
83	MERRIMAN, HUW W. WELLBROOK HOUSE FIR TOLL ROAD MAYFIELD, TN20 6NF UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/21/2009	26033	Undetermined
84	MERRIMAN, SHAWNDA D. 567 KRYPTONITE DR. CASTLE ROCK, CO 80108	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/29/2009	7457	\$6,120.36
85	MICHAEL, RONEMOUS 5215 LACREEK LANE SPRING, TX 77379	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/31/2009	6847	\$60,000.00
86	MILLER, CHRISTINA X. 100 DUDLEY STREER APT 2341 JERSEY CITY, NJ 07302	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31196	\$23,633.00
87	MORAN, BRIAN M. 139 S TRYON ST UNIT 4B CHARLOTTE, NC 202022142		Lehman No Case Asserted/All Cases Asserted	09/22/2009	32310	\$150,000.00
88	MULLER, ERIK W. 137 WOOSTER ST. APT 5A NEW YORK, NY 10012	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/24/2009	6138	\$208,658.51
89	MURPHY, KEVIN C. 4 ATHERTON RD WINCHESTER, MA 01890	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/31/2009	9768	\$138,639.63

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
90	MURRAY, BRYAN J. 243 N. PLEASANT AVE. RIDGEWOOD, NJ 07450	08-13555 (JMP)	Lehman Brothers Holdings Inc.	05/14/2009	4331	\$86,103.00
91	NAJAR, JOSEF 36 EAST 72ND STREET NEW YORK, NY 10021	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18910	\$6,363.69
92	NANGIA, SAMIR 245 E 24TH ST APT 5G NEW YORK, NY 10010-3825		Lehman No Case Asserted/All Cases Asserted	09/16/2009	14308	\$218,399.00
93	NICORA, GUSTAVO FEDERICO GUIDO 1612 PISO 13 1016 BUENOS AIRES, ARGENTINA	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	22743	\$19,162.04
94	O'HARA, EMMETT 32 WEST LANE BAY SHORE, NY 11706		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27281	\$143,482.33
95	O'KEEFE, SEAN B. 660 SHERWOOD RD HO HO KUS, NJ 07423	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	14649	\$202,434.59
96	ORLOSKY, JASON 25 GLENBROOK ROAD, APT. 606 STAMFORD, CT 06902	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	26119	\$3,864.00
97	OWEN, KEVIN HUGH 1451 MOUNTAIN BLVD OAKLAND, CA 94611	08-13555 (JMP)	Lehman Brothers Holdings Inc.	06/03/2009	4754	\$420,549.00
98	PAGDIWALLA, ASHA 169 E 88TH STREET APT 4 NEW YORK, NY 10128		Lehman No Case Asserted/All Cases Asserted	09/22/2009	30078	\$7,475.01
99	PALCHYNSKY, JOHN N. 32 HILLDALE ROAD PINE BROOK, NJ 07058	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/23/2009	34713	\$36,447.00

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
100	PETTIT-BREINGAN, LARA 7A LOCUST LANE HUNTINGTON, NY 11743	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	31712	Undetermined
101	PLASKETT, RODNEY A. 40 BIRCHWOOD LANE HARTSDALE, NY 10530	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/01/2009	5063	\$62,290.47
102	PUSKULDJIAN, PAUL A. 50 ROOSEVELT AVE GLEN HEAD, NY 11545	08-13555 (JMP)	Lehman Brothers Holdings Inc.	07/22/2009	5858	\$120,809.00
103	RAFFAELE, DIANE 144 E 84TH STREET APT 6G NEW YORK, NY 10028	08-13555 (JMP)	Lehman Brothers Holdings Inc.	08/26/2009	9409	\$7,751.00
104	RODRIGUEZ, JUAN LIDO 30 MADRID, 28043 SPAIN		Lehman No Case Asserted/All Cases Asserted	09/21/2009	22754	\$144,000.00
105	RODRIGUEZ-COLON, ELIZABETH URB, DOS PINOS 784 CALLE LINCE SAN JUAN, PR 00923	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/23/2009	34490	Undetermined
106	RODRIGUEZ-GENTA, IGNACIO MARTIN MALAVAR 976 1632 VICENTE LOPEZ BUENOS AIRES, ARGENTINA		Lehman No Case Asserted/All Cases Asserted	09/21/2009	24437	\$43,459.00
107	SAHLMAN, WILLIAM W. 179 BERGEN ST. BROOKLYN, NY 11217	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29527	\$421,527.00
108	SAKS, ROGER 64 TWIN BROOKS RD SADDLE RIVER, NJ 07458		Lehman No Case Asserted/All Cases Asserted	09/18/2009	19077	\$3,736,268.27

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
109	SALVATORE, JULIANNE 309 101ST STREET BROOKLYN, NY 11209	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/08/2009	10632	\$160,850.00
110	SARKAR, AMIT K 78 LANSDOWNE RD NOTTINGHILL LONDON, W112LS UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/24/2009	34872	\$3,076,963.23
111	SCHLATTE, KONRAD 22, MOSSBURY ROAD LONDON, SW 11 2PB UNITED KINGDOM	08-13905 (JMP)	CES Aviation LLC	09/22/2009	30733	Undetermined
112	SECRIST III, DELBERT 2015 LEEWARD LN NEWPORT BEACH, CA 926603806		Lehman No Case Asserted/All Cases Asserted	09/14/2009	12230	\$16,872.01
113	SHAFIR, MARK G. 145 E 92ND ST # 8A NEW YORK, NY 10128-2431	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30426	\$40,895,308.00
114	SHENTON, JOSEPH W. JR. 200 CHURCH RD WINNETKA, IL 60093-3944	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	13293	\$421,020.09
115	SHERR, DAVID N 43 GARDEN ROAD SCARSDALE, NY 10583		Lehman No Case Asserted/All Cases Asserted	09/22/2009	27437	Undetermined
116	SMEJKAL, FRANK 1305 BEVERLY STREET HOUSTON, TX 77008	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/23/2009	34672	\$78,000.00
117	SMITH, JAMES P. 50 CAMBRIDGE DR SHORT HILLS, NJ 07078		Lehman No Case Asserted/All Cases Asserted	09/23/2009	34565	\$614,929.39

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
118	SMITH, ROBERT DAVID 635 W 42ND ST # 2E NEW YORK, NY 10036	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	22928	\$5,277.21
119	STACK, RONALD A. 22 SHOREWOOD DRIVE SANDS POINT, NY 11050		Lehman No Case Asserted/All Cases Asserted	09/16/2009	13430	\$4,406,999.00
120	STANDFORD-BUTLER, DEBORAH 26 CORNEILUIS WAY SOMERSET, NJ 08873		Lehman No Case Asserted/All Cases Asserted	09/22/2009	28568	\$4,423.69
121	SYPECK, ROBERT S 15 HIGHLAND AVE FAIR HAVEN, NJ 07704	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29470	\$537,508.38
122	TAKIL, GURCAN 161 BLUE HERON CT HOLMDEL, NJ 07733	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/18/2009	18934	\$300,746.71
123	TALBOT, BRIAN 15 CATHEDRAL AVENUE GARDEN CITY, NY 11530	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15083 ¹	\$692,289.00
124	THAW, MITCHELL D. 53 MAPLE AVENUE NORTH WESTPORT, CT 06880	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/16/2009	14034	\$56,027.90
125	THORNTON, MATTHEW 514 WILLOW RD WINNETKA, IL 60093-4134	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/17/2009	15753	\$95,345.00
126	TOBIN, PAUL G. 20 E. CEDAR ST., 4E CHICAGO, IL 60611		Lehman No Case Asserted/All Cases Asserted	09/10/2009	11122	\$496,168.87

¹ Claim 15083 is being reclassified as an equity interest solely with respect to its asserted claims for Equity Awards in the amount of \$692,289. All other portions of Claim 15083 were previously expunged pursuant to the Order Granting Debtors' Fifty-Third Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims), dated 11/10/2010, ECF. No. 12681.

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
127	TUIL, LAURENT FLAT 4 FORDIE HOUSE 82 SLOANE STREET LONDON, SW1X 9PA UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	32257	\$79,650.72
128	VENKATESH, PRASANA 17 EVELYN ROAD APT 20-05 309306 SINGAPORE		Lehman No Case Asserted/All Cases Asserted	08/06/2009	7477	\$181,619.00
129	VERMA, DIVYA 3195 ASHER RD ANN ARBOR, MI 48104-4170	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	29706	\$2,072.00
130	VOJTA, MARJORIE C. 4412 COTTONWOOD SCOTTSBLUFF, NE 69361		Lehman No Case Asserted/All Cases Asserted	07/17/2009	5568 ²	\$7,583.74
131	WALLACE, MICHAEL P. 2000 AVENUE OF THE STARS 7TH FLOOR, NORTH LOS ANGELES, CA 90067	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	22290	\$27,710.00
132	WARDELL, JEFFERY K. 2255 BUSH STREET #1 SAN FRANCISCO, CA 94115		Lehman No Case Asserted/All Cases Asserted	09/21/2009	24545	\$50,638.80
133	WARREN, ANGUS 27 ANTROBUS ROAD LONDON, W4 5HY UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/18/2009	16274	\$128,206.00

² Claim 5568 is being reclassified as an equity interest solely with respect to its asserted claim for Equity Awards in the amount of \$7,583.74. All other portions of Claim 5568 were previously expunged pursuant to the Order Granting Debtors' Sixty-Sixth Omnibus Objection to Claims (Duplicative of Indenture Trustee Claims), dated 12/22/2010, ECF. No. 13621.

IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

OMNIBUS OBJECTION 176 - EXHIBIT A: RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	TOTAL CLAIM DOLLARS
134	WEILL, THIERRY FLAT 3, 95 AVENUE ROAD NW86HY UNITED KINGDOM		Lehman No Case Asserted/All Cases Asserted	09/22/2009	32231	\$107,008.00
135	WHITTEMORE, ERLE TODD 6179 E. OTERO DR. CENTENNIAL, CO 80112	08-13555 (JMP)	Lehman Brothers Holdings Inc.	01/29/2009	2389	\$90,640.96
136	WINTHROP, DEREK A. 203 EAST 72ND ST APT 5D NEW YORK, NY 10021		Lehman No Case Asserted/All Cases Asserted	09/22/2009	31922	\$64,113.00
137	WOODTHORPE, JAMES W 44 HOLMEWOOD RIDGE LANGTON GREEN, KENT, TN3 0ED UNITED KINGDOM	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/21/2009	34207	\$11,473.50
138	ZAMEER, KHAN H. 25-GREEN ACRES AVENUE EAST BRUNSWICK, NJ 08816	08-13555 (JMP)	Lehman Brothers Holdings Inc.	09/22/2009	30753	\$7,221.00
139	ZAVOLTA, FRANCESCA M. 311 WEST 76TH STREET APARTMENT 3 NEW YORK, NY 10023		Lehman No Case Asserted/All Cases Asserted	09/19/2009	19567	\$333,957.91
					TOTAL	\$311,615,425.14

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (JMP)
	:
Debtors.	: (Jointly Administered)
-----X	

**ORDER GRANTING DEBTORS'
ONE HUNDRED SEVENTY-SIXTH OMNIBUS OBJECTION TO
CLAIMS (TO RECLASSIFY PROOFS OF CLAIM AS EQUITY INTERESTS)**

Upon the one hundred seventy-sixth omnibus objection to claims, dated August 19, 2011, (the “One Hundred Seventy-Sixth Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession, in accordance with Rule 3007(d) of the Federal Rules of Bankruptcy Procedure and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking to reclassify Compensation Claims as common equity interests in the LBHI, all as more fully described in the One Hundred Seventy-Sixth Omnibus Objection to Claims; and due and proper notice of the One Hundred Seventy-Sixth Omnibus Objection to Claims having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief requested in the One Hundred Seventy-Sixth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred Seventy-Sixth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the One Hundred Seventy-Sixth Omnibus Objection to Claims.

ORDERED that the relief requested in the One Hundred Seventy-Sixth Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that the claims listed on Exhibit 1 annexed hereto under the heading “*Claims to be Reclassified*” are reclassified as equity interests having the same priority as, and no greater priority than, common stock interests in LBHI; and it is further

ORDERED that the Debtors’ Court-appointed claims agent is authorized to modify the claims register to reflect this order; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to any claim listed on Exhibit A annexed to the One Hundred Seventy-Sixth Omnibus Objection to Claims that is not listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: _____, 2011
New York, New York

UNITED STATES BANKRUPTCY JUDGE